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August 17, 2019

Via ECF

Honorable Evelyn Padin, U.S.D.J.
District of New Jersey
Martin Luther King Building
& U.S. Courthouse
50 Walnut Street Room 4015
Newark, NJ 07101

Re: Mendham Methodist Church v. County of Morris
Case No.: 2:23-cv-02347-EP-JSA

Dear Judge Padin:

As your file may reflect, I represent Defendants Morris County, Morris County board of County Commissioners, Morris County Historic Preservation Trust Fund Review Board and John Krickus (hereinafter, "Morris County") with respect to the above-captioned matter. I am in receipt of the Motion to Intervene filed on behalf of David Steketee and the Freedom from Religion Foundation.

(D.E.16)

I write to advise the Court that Morris County takes no position with respect to the Motion to Intervene and leaves same to the sound discretion of the Court. With respect to the need

Honorable Evelyn Padin, U.S.D.J.

Re: The Mendham Methodist Church and The Zion Lutheran Church

Long Valley v. The County of Morris, et al.

August 16, 2023

Page 2

for formal discovery in this matter, Morris County asserts that all facts necessary for the Court to rule on Plaintiff's Motion for Summary Judgment (D.E. 18) and the Cross Motion for Summary Judgment to be filed on behalf of Morris County are fully set forth in the Joint Stipulation of Facts. As a result, Morris County respectfully submits that no formal discovery is required for a full disposition of this matter.

Thank you for your consideration of the within.

Respectfully submitted,

JOHN A. NAPOLITANO,
MORRIS COUNTY COUNSEL

By: *William G. Johnson*
William G. Johnson, Esq.
Special County Counsel

WGJ/dv

Cc: All Attorneys of Record - Via ECF